

James Robert Noblin (State Bar No. 114442)
GREEN & NOBLIN, P.C.
4500 East Pacific Coast Highway, Fourth Floor
Long Beach, California 90804
Telephone: (562) 391-2487
Facsimile: (415) 477-6710
-and-
2200 Larkspur Landing Circle, Suite 101
Larkspur, CA 94939
Telephone: (415) 477-6700
Facsimile: (415) 477-6710
Email: gncf@classcounsel.com

Liaison Counsel for Plaintiffs

William B. Federman (admitted *pro hac vice*)

FEDERMAN & SHERWOOD
10205 N. Pennsylvania Avenue
Oklahoma City, OK 73120
Telephone: (405) 235-1560
Facsimile: (405) 239-2112

Lead Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DISTRICT**

MICHAEL J. ANGLEY,
Individually and on Behalf of All
Others Similarly Situated.

Plaintiff.

v.

UTI WORLDWIDE, INC., et al.,

Defendants.

Case No. 2:14-cv-02066-CBM-E

CLASS ACTION

**PLAINTIFFS' NOTICE AND
MOTION FOR AWARD OF
ATTORNEYS' FEES,
REIMBURSEMENT OF
LITIGATION EXPENSES, AND
REIMBURSEMENT AWARD TO
LEAD PLAINTIFF**

Judge: Hon. Consuelo B. Marshall

Date: February 26, 2019

Time: 10:00 a.m.

Place: Courtroom 8B

1 PLEASE TAKE NOTICE that Lead Plaintiff Stratesis, LLC (“Lead
2 Plaintiff”) and all Class Members (collectively “Plaintiffs”) hereby move the Court
3 pursuant to Rule 23(e) of the Federal Rules of Civil Procedure for an Order: (1)
4 awarding attorneys’ fees in the amount equal to 28% of the Settlement Fund; (2)
5 reimbursing litigation expenses of \$578,340.30 that were incurred in prosecuting
6 this action; and (3) awarding Lead Plaintiff in the amount of \$20,000 as
7 reimbursement for the time and effort Lead Plaintiff expended in this action for the
8 benefit of the Class.

9 Pursuant to Local Rule 7-3, Lead Counsel has met and conferred with counsel
10 for Defendants, and Defendants take no position on this motion.

11 Pursuant to the Court’s Order entered on September 5, 2018 (Dkt. No. 139),
12 this Motion is set for hearing on February 26, 2019, at 10:00 a.m., or as soon
13 thereafter as this matter may be heard, before the Honorable Consuelo B. Marshall
14 of the United States District Court for the Central District of California, Courtroom
15 8B, 350 W. 1st Street, CA 90012.

16 In support of this Motion, Plaintiffs submit the accompanying Memorandum
17 of Law in Support of Motion for Award of Attorneys’ Fees, Reimbursement of
18 Litigation Expenses, and Reimbursement Award to Lead Plaintiff, submitted
19 herewith; the Declaration of William B. Federman in Support of (1) Plaintiffs’
20 Motion for Final Approval of Settlement, and (2) Plaintiffs’ Motion for Award of
21 Attorneys’ Fees, Reimbursement of Litigation Expenses, and Reimbursement
22 Award to Lead Plaintiff and the exhibits thereto, submitted herewith; the
23 Memorandum of Law in Support of Unopposed Motion for Final Approval of the
24 Settlement, submitted herewith; the Stipulation of Settlement and the exhibits
25 thereto, dated August 7, 2018 (Dkt. No. 134-1); all pleadings and papers filed
26 herein; arguments of counsel; and any other matters properly before the Court.

1 Dated: January 28, 2019

Respectfully submitted,

2 /s/ William B. Federman
3 William B. Federman
4 (admitted *Pro Hac Vice*)
5 FEDERMAN & SHERWOOD
6 10205 North Pennsylvania Avenue
7 Oklahoma City, OK 73120
8 Telephone: (405) 235-1560
9 Facsimile: (405) 239-2112
-and-
2916 Maple Ave., Ste. 200
Dallas, TX 75201
Telephone: (214) 696-1100
wbf@federmanlaw.com

11 *Lead Counsel for Plaintiffs*

13 James R. Noblin
14 GREEN & NOBLIN, P.C.
15 4500 E. Pacific Coast Hwy., 4th Floor
16 Long Beach, CA 90804
17 Telephone: (562) 391-2487
18 -and-
19 700 Larkspur Landing Cir., Ste. 275
Larkspur, CA 94939
Telephone: (415) 477-6700
jrn@classcounsel.com

20 *Liaison Counsel for Plaintiffs*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that this Notice was filed through the ECF system and will
3 be sent electronically to the registered participants as identified on the Notice of
4 Electronic Filing (NEF), and paper copies will be sent to those indicated as non-
5 registered participants on Monday, January 28, 2019.

6

7 _____
8 /s/ William B. Federman
9 William B. Federman